

Kevin R. Anderson (4786)  
Jocelyn J. Rick (9508)  
Kellie K. Nielsen (11416)  
OFFICE OF THE CHAPTER 13 TRUSTEE  
405 South Main Street, Suite 600  
Salt Lake City, Utah 84111  
Telephone: (801) 596-2884  
Facsimile: (801) 596-2898  
Email: kratrusteemail@ch13kra.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

IN RE:  SCOTT CHRISTOPHER ROGERS AMBER DAWN ROGERS  Debtors	CASE NO: 11-24007  Chapter 13  JUDGE WILLIAM T. THURMAN
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**TRUSTEE'S CONTINUING OBJECTION TO CONFIRMATION**

KEVIN R. ANDERSON, Chapter 13 Trustee, hereby objects to confirmation based on the following unresolved issues:

1. The Debtors have not resolved all issues raised in the Trustee's initial objection to confirmation.

The unresolved issues are set forth in paragraph(s) 5; 6 of the Trustee's initial objection.

2. The debtor's plan proposes to value under 11 U.S.C. § 506(a) an allegedly wholly-unsecured lien on the debtor(s)' principal residence. Counsel should immediately file and serve an action to Value Lien under Bankruptcy Rules 9014 and 7004 so that the status of lien can be determined in connection with the confirmation hearing. The Motion to Value Lien should clarify that if the debtor(s) prevails, the claim will be reclassified as unsecured for purposes of the plan, but that the creditor will retain its lien until the entry of a discharge under 11 U.S.C. § 1328; and that if the Chapter 13 case is dismissed or converted, such lien will be retained by the creditor to the extent recognized by applicable nonbankruptcy law (*see In re Woolsey*, 438 B.R. 432 (Bankr. D. Utah, 2010)).

THEREFORE, the Trustee has an ongoing objection to the confirmation

DATED: May 23, 2011

KRA /s/  
Kevin R. Anderson, Esq.  
Standing Chapter 13 Trustee

CERTIFICATE OF MAILING

The undersigned hereby certifies that true and correct copy of the foregoing Trustee's Continuing Objection to Confirmation was served upon all persons entitled to receive notice in this case via ECF notification or by U.S. Mail to the following parties on May 23, 2011:

Robert S. Payne, Lincoln Law, 921 West Center Street, Orem, UT 84057